

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
NORTHEASTERN DIVISION**

REGINALD WHITE, JR.,)
Plaintiff,)
vs.)
LIEUTENANT ERIC W. HINES, and)
OFFICER SCOTT A SCHUTTINGS,)
RESPONDENT.)

Case No. 5:19-cv-00750-MHH-HNJ

AFFIDAVIT

Before me, the undersigned authority, a Notary Public, in and for said County and State of Alabama at large, personally appeared Eric W. Hines who being known to me and being by me first duly sworn, deposes and says on oath as follows:

My name is Eric W. Hines. I am currently employed with the Alabama Department of Corrections as a Lieutenant at Bibb County Correctional Facility, 565 Bibb Lane, Brent, Alabama 35034.

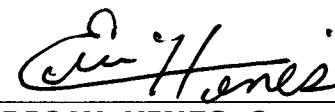
In the complaint, inmate Reginald White, Jr., AIS#251345, alleges that on April 14, 2019 that I, Lieutenant Eric Hines "snatched him up" aggressively after being handcuffed, and pulled him by the arm out of B-Dorm. This allegation is false. At no time did I snatch inmate White up in an aggressive manner.

Inmate White also alleged that I refused a request from him to pull his pants up and that I stated, "didn't I tell you to walk boy". This allegation is false. I did not refuse a request to pull inmate White's pants up, nor did I state for him to walk "boy".

Inmate White further alleged that I sprayed him with "mace", and beat him across the knee with a baton upon his objection to walk. This allegation is False. I did however, administer inmate White with a one second burst of sabre red spray, upon inmate White's unruly and aggressive behavior, by attempting to kick several staff members.

Inmate White also failed to comply with the initial amount of force used and attempted to snatch away and elude my control. I then struck inmate White several times to his lower right leg. Inmate White was then given a direct order to cease his negative behavior. Inmate White complied, and all force ceased.

This information is true and correct to the best of my knowledge. At no time during the incident was the force used in an inappropriate or improper manner. A medical assessment was conducted and pictures taken in accordance with policy and regulation.



ERIC W. HINES, Correctional Lieutenant

SWORN TO AND SUBSCRIBED before me this January 3rd of 2020.



LAURA HINES, NOTARY PUBLIC

October 3, 2022
My Commission Expires